2415752.1 14529.014

1 GABRIEL P. HERRERA, State Bar No. 287093 gherrera@kmtg.com KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD 2 A Professional Corporation 1331 Garden Hwy, 2<sup>nd</sup> Floor Sacramento, California 95833 Telephone: (916) 321-4500 Facsimile: (916) 321-4555 5 Attorneys for KIMBERLY J. HUSTED, 6 Chapter 7 Trustee 7 8 UNITED STATES BANKRUPTCY COURT 9 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION 10 11 In re Case No. 22-22056 Chapter 7 12 DAVID R. MICHAL, DCN: KMT-3 13 Debtor. STIPULATION FOR EXTENSION OF 14 **SECTION 727 DEADLINES** 15 16 KIMBERLY J. HUSTED ("Trustee"), in her capacity as the Chapter 7 trustee for the bankruptcy estate of DAVID R. MICHAL ("Debtor"), and the Debtor for their stipulation recite as 17 follows: 18 19 1. On August 18, 2022, the above-captioned bankruptcy case was commenced by the 20 filing of an involuntary Chapter 7 petition. After trial, on or about June 5, 2023, the Court entered 21 a judgment ordering relief on Chapter 7 petition filed under 11 U.S.C. section 303. The Trustee is 22 the appointed Chapter 7 trustee for the Debtor's bankruptcy estate. 2. 23 The first scheduled 341 meeting of creditors was scheduled for July 14, 2023, setting the deadline to object to the Debtor's discharge under 11 U.S.C. § 727 as September 12, 25 2023. 26 3. The Debtor's 341 meeting of creditors has been continued to September 22, 2023, prior to which the Trustee has requested information and numerous documents. As such, the 27 Trustee seeks a continuance of the discharge deadline. 28

STIPULATION FOR EXTENSION OF SECTION 727 DEADLINES

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## 1 WHEREFORE, the parties stipulate as follows: The deadline to file a complaint objecting to the Debtor's discharge pursuant to 11 2 3 U.S.C. § 727 is extended through October 12, 2023. В. The extension applies to the Trustee and the United States Trustee only. 4 5 6 7 8 DATED: September 6, 2023 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD A Professional Corporation 9 10 By: 11 Gabriel P. Herrera 12 Attorneys for KIMBERLY J. HUSTED, Chapter 7 Trustee 13 14 DATED: September 6, 2023 DUANE MORRIS 15 16 By: 17 Ron Oliner Attorneys for Debtor, 18 DAVID R. MICHAL 19 20 21 22 23 24 25 26 27 28

STIPULATION FOR EXTENSION OF SECTION 727 DEADLINES